

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

UNITED STATES OF AMERICA,

Plaintiff

V.

THE BOEING COMPANY,

Defendant.

Case No. 4:21-cr-00005-O-1

**MOTION BY NAOISE CONNOLLY RYAN, ET AL. TO WITHDRAW KYLE OXFORD
AS COUNSEL OF RECORD**

Pursuant to LCrR 57.12, Naoise Connolly Ryan et al.¹ (the “victims’ families” or “families”), through undersigned counsel, file this Motion to Withdraw Kyle Oxford as Counsel of Record for the Families.

Kyle Oxford is no longer with Burns Charest LLP. The Families continue to be represented by the undersigned counsel.

The requested withdrawal of counsel will not cause continuance or delay in this case.

CONCLUSION

The Families respectfully request that this Court grant the Motion to Withdraw Kyle Oxford as Counsel of Record for the Families. The Families further respectfully request that the Court enter an order reflecting this withdrawal and that all necessary changes be made to the Court's records and ECF.

¹ In addition to Ms. Ryan, the other victims' family members filing this motion are Emily Chelangat Babu and Joshua Mwazo Babu, Catherine Berthet, Huguette Debets, Luca Dieci, Bayihe Demissie, Sri Hartati, Zipporah Kuria, Javier de Luis, Nadia Milleron and Michael Stumo, Chris Moore, Paul Njoroge, Yuke Meiske Pelealu, John Karanja Quindos, Guy Daud Iskandar Zen S., and others similarly situated.

Dated: June 18, 2025

Respectfully submitted,

/s/ Darren P. Nicholson

Warren T. Burns
Texas Bar No. 24053119
Darren P. Nicholson
Texas Bar No. 24032789
Chase Hilton
Texas Bar No. 24100866
BURNS CHAREST LLP
900 Jackson Street, Suite 500
Dallas, Texas 75202
Telephone: (469) 904-4550
wburns@burnscharest.com
dnicholson@burnscharest.com
chilton@burnscharest.com

/s/ Paul G. Cassell

Paul G. Cassell (Utah Bar No. 06078)
(Counsel of Record)
Utah Appellate Project
S.J. QUINNEY COLLEGE OF LAW
University of Utah
cassellp@law.utah.edu
(no institutional endorsement implied)

Tracy A. Brammeier
CLIFFORD LAW OFFICES PC
tab@cliffordlaw.com

Erin R. Applebaum
KREINDLER & KREINDLER LLP
eapplebaum@kreindler.com

Pablo Rojas
PODHURST ORSECK PA
projas@podhurst.com

Attorneys for Victims' Families

CERTIFICATE OF SERVICE

I certify that on June 18, 2025, the foregoing document was served on the parties to the proceedings via the Court's CM/ECF filing system.

/s/ Darren P. Nicholson

Darren P. Nicholson